



**FROM**

Philippe de Gouttes

**DATE**

August 6, 2004

**PHONE**

+33 (0) 5 61 93 27 91

**FAX**

+33 (0) 5 61 93 31 55

**E-MAIL**

philippe.de-gouttes@airbus.com

**OUR REFERENCE**

M04008235

**YOUR REFERENCE**

Docket Management Facility  
U.S. Department of Transportation  
400 Seventh Street, SW.  
Nassif Building, Room PL-401  
Washington, DC 20590-001  
U.S.A.

**DOCKET No. FAA-2004-17681, AGING AIRPLANE PROGRAM UPDATE: REQUEST FOR EXTENSION OF THE COMMENT PERIOD**

Dear Sir or Madam,

Under the provisions of 14 CFR § 11.47, Airbus respectfully requests an extension of the allowable time for filing comments on this docket. Our request relates to the "New Approach for Requirements for Design Approval Holders" in general (69 FR 45940) and, in addition, the details of this new approach as it may in future apply to the Enhanced Airworthiness Program for Airplane Systems (EAPAS), the Aging Airplane Safety Rule, and the Widespread Fatigue Damage Program.

We do not anticipate the need for an extension of the allowable comment period for the Final Rule dealing with the Fuel Tank Safety Compliance Extension.

The discussion of future plans provided in this rulemaking is very helpful, and we appreciate the FAA's willingness to publish its plans dealing with the changes it sees necessary to requirements for design approval holders. These changes are important, and represent a major shift in FAA philosophy as to regulatory requirements for design approval holders. They also can potentially have a substantial effect on the business plans and relationships between design approval holders and operators. Further, they would, if adopted as outlined, change Part 25 from a rule that is essentially unchanging after a certification basis is established, to one whose requirements for a given type may change during and even well after type certification is complete. For these reasons, Airbus has a strong interest in carefully considering the implications of these potential changes and providing comments to the FAA.



Unfortunately, the comment period provided in this notice is quite short for such a complex issue, and in addition corresponds with the height of vacation period in the northern hemisphere. Manufacturers, government authorities, and industry interest groups all have heavy vacation schedules underway during August, both in Europe and the North American area. We therefore respectfully request that FAA permit comment filing through October 31, 2004 to give sufficient time for the development of thoughtful comments by industry and other interested parties.

Thank you for your consideration of our request.

Very truly yours,

A handwritten signature in black ink, appearing to read "Philippe de Gouttes".

Philippe de Gouttes  
Manager, Aviation Regulations  
Product Integrity Division

Copies by email to

[Tony.Fazio@faa.gov](mailto:Tony.Fazio@faa.gov)  
[Mario.Giordano@faa.gov](mailto:Mario.Giordano@faa.gov)  
[Jim.Ballough@faa.gov](mailto:Jim.Ballough@faa.gov)  
[John.Hickey@faa.gov](mailto:John.Hickey@faa.gov)  
[Nick.Sabatini@faa.gov](mailto:Nick.Sabatini@faa.gov)